

To: Francine Torres  
National Organic Program  
USDA-AMS-TMP-NOP  
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Re: Approve Ferric Phosphate for use in organic farming.

Date of Review: February 28th – March 3, 2005

As an organic grower I'm encouraging you to approve Ferric Phosphate for inclusion on the National List and use in organic farming. I am against the two TAP reviewer's recommendations of not allowing Ferric Phosphate for use as a molluscicide. Ferric Phosphate occurs naturally in soil and has no known harmful effects on other organisms. Current organically approved methods cited as alternatives are not practical for organic farming.

We operate an organic **strawberry/raspberry** farm of 116 acres in Watsonville, California. Slugs and snails are major pests on our farm. Economic losses from slug/snail damage are often significant and can exceed 25% damage marketable fruit or more. In some areas of fields that damage can be much greater. Not only do we lose yield, but employees suffer by having to sort damaged fruit that is made unmarketable do to slug or snail damage.

Currently, there are no effective organically approved slug/snail control methods. Other methods such as copper banding, trapping, decoy plantings or diatomaceous earth are neither practical nor effective on a production farm of this acreage and do not significantly reduce slug/snail damage within the field. In raspberries we are forced to hand collect snails after rains which is only slightly beneficial. We do not use these other methods on our farm, although we have tried them with no good results.

Organic growers need to have effective tools at our disposal. Lack of an organic slug and snail bait costs us money every year. Please ensure that Ferric Phosphate is approved for use as a molluscicide in organic farming.

Sincerely,

**Daniel T. Schmida**

**Sandpiper Farms, LLC**